

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

**In re:** )  
 )  
 ) **CASE NO. 16-10651-elf**  
**Keith B. Thomas** )  
 **and** ) **JUDGE Eric L. Frank**  
**Shirvell M. Thomas** )  
 )  
 **Debtor** )

**NewRez LLC d/b/a Shellpoint Mortgage Servicing NOTICE OF DEBTOR'S REQUEST  
FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 11/01/2020 through 01/01/2021. Creditor holds a secured interest in real property commonly known as 4717 Osage Ave., Philadelphia, Pennsylvania 19143 as evidenced by claim number 3-1 on the court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 02/01/2021 and will be required to cure the delinquency created by the forbearance period (hereinafter "forbearance

arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

**Robertson, Anschutz, Schneid & Crane  
LLC**

Attorney for Secured Creditor  
10700 Abbott’s Bridge Rd., Suite 170  
Duluth, GA 30097  
Telephone: (470) 321-7112  
By: /s/ Charles G. Wohlrab  
Charles G. Wohlrab, Esquire  
PA Bar Number 314532  
Email: [cwohlrab@rascrane.com](mailto:cwohlrab@rascrane.com)

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* was served upon the following parties in the following fashion on this 16th day of December 2020:

**Keith B. Thomas**  
**4717 Osage Ave**  
**Philadelphia, PA 19143**

**Shirvell M. Thomas**  
**4717 Osage Ave**  
**Philadelphia, PA 19143**

And via electronic mail to:

**JOHN L. MCCLAIN**  
**John L McClain & Associates, PC**  
**1851 County Route 27**  
**1851 CR 27**  
**12969**  
**Owls Head, NY 12969**

**WILLIAM C. MILLER, Esq.**  
**Chapter 13 Trustee**  
**P.O. Box 1229**  
**Philadelphia, PA 19105**

**United States Trustee**  
**Office of the U.S. Trustee**  
**200 Chestnut Street**  
**Suite 502**  
**Philadelphia, PA 19106**

**Robertson, Anschutz, Schneid & Crane  
LLC**

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